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8 **Attorney for Plaintiff**
9 **NATALIA TSUBERA**

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12 **UNITED STATES DISTRICT COURT**
13 **EASTERN DISTRICT OF CALIFORNIA**

14 **-00O0o-**

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16 **NATALIA TSUBERA,**
17 **Plaintiff,**

18 **v.**

19 **No. 2:24-cv-01789-AC**

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21 **STIPULATION AND [proposed]**
22 **ORDER FOR EXTENSION OF**
23 **TIME TO FILE PLAINTIFF'S**
24 **MOTION FOR SUMMARY**
25 **JUDGMENT**

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27 **Michael O'Malley,**
28 **COMMISSIONER OF SOCIAL SECURITY,**

29 **Defendant.**

30 **/**

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32 IT IS HEREBY STIPULATED by and between the parties, through their respective
33 undersigned attorneys, and with the permission of the Court, that plaintiff's time to file a motion
34 for summary judgment is extended to October 14, 2024.

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36 This is a first extension. Plaintiff's counsel is currently working on an opening brief for
37 the Ninth Circuit and has other district court, Appeals Council, and prehearing briefs due in
38 September, plus one district court motion for summary judgment due earlier in October, such
39 that it may not be possible to complete this motion earlier than requested.

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2 Dated: September 46 2024

/s/ *Jesse S. Kaplan*
JESSE S. KAPLAN
Attorney for Plaintiff

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5 Dated: September 5, 2024

/s/ *per e-mail authorization*

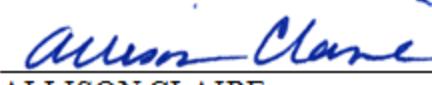
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7 JUSTIN L. MARTIN
8 Special Assistant U.S. Attorney
9 Attorney for Defendant

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11 **ORDER**

12 For good cause shown on the basis of this stipulation, the requested extension of
13 plaintiff's time to file plaintiff's motion for summary judgment is extended to October 14, 2024.
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15 SO ORDERED.

16 DATED: September 6, 2024

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18 ALLISON CLAIRE
19 UNITED STATES MAGISTRATE JUDGE
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